

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

<b>In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION</b>	Master File No. 12-md-02311 Honorable Marianne O. Battani
<b>In re: WIRE HARNESS CASES</b>	W:12-cv-00100-MOB-MKM
<b>THIS DOCUMENT RELATES TO:  ALL WIRE HARNESS CASES</b>	W: 12-cv-00101-MOB-MKM W: 12-cv-00102-MOB-MKM W: 12-cv-00103-MOB-MKM

**STIPULATION OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the Direct Purchaser Plaintiffs, the Automobile Dealer Plaintiffs, End-Payor Plaintiffs (Collectively, “Plaintiffs”) and the undersigned Defendants hereby stipulate and agree as follows:

(1) American Furukawa, Inc., by reason of its merger with Furukawa Wiring Systems America, Inc., by operation of Delaware law and the merger agreement, assumed, any and all debts and liabilities of Furukawa Wiring Systems America, Inc., if any, effective as of September 30, 2011;

(2) Upon the request of said Defendants, Furukawa Wiring Systems America, Inc. shall be and hereby is voluntarily dismissed from all of the above-entitled actions;

(3) The rights of Plaintiffs and the putative Class members they seek to represent, if any, as potential creditors of Furukawa Wiring Systems America, Inc., are unimpaired and unmodified by this dismissal;

(4) Dismissal of these actions as against Furukawa Wiring Systems America, Inc. is without prejudice, and Plaintiffs and Defendants shall bear their own attorneys' fees and costs;

(5) The dismissal of Furukawa Wiring Systems America, Inc. shall not operate to bar, limit, modify or release any of the claims of the Plaintiffs, or of the members of the Classes they seek to represent, against any other person or entity;

(6) This Stipulation does not alter Plaintiffs' allegations in their operative complaints concerning Furukawa Wiring Systems America, Inc., or the statements regarding Furukawa Wiring Systems America, Inc. made by Furukawa Wiring Systems America, Inc., American Furukawa, Inc., and Furukawa Electric Co., Ltd., in their answers to those complaints; and

(7) This Stipulation preserves, and does not operate to bar, limit, modify, release or waive, the rights, claims and defenses of American Furukawa, Inc., Furukawa Electric Co., Ltd., and Furukawa Wiring Systems America, Inc. with

respect to (i) the debts and liabilities of Furukawa Wiring Systems America, Inc., if any, and (ii) the claims of the Plaintiffs and the members of the Classes they seek to represent.

Dated: October 30, 2013.

Respectfully submitted,

/s/ William E. Hoese (w/ consent)

Joseph C. Kohn

William E. Hoese

Douglas A. Abrahams

**KOHN, SWIFT & GRAF, P.C.**

One South Broad Street, Suite 2100

Philadelphia, PA 19107

Telephone: (215) 238-1700

jkohn@koh Swift.com

whoese@koh Swift.com

dabrahams@koh Swift.com

Gregory P. Hansel

Randall B. Weill

Michael S. Smith

**PRETI, FLAHERTY, BELIVEAU  
& PACHIOS LLP**

One City Center, P.O. Box 9546

Portland, ME 04112-9546

Telephone: (207) 791-3000

ghansel@preti.com

rweill@preti.com

msmith@preti.com

Michael J. Freed  
Steven A. Kanner  
William H. London  
Michael L. Silverman  
**FREED KANNER LONDON  
& MILLEN LLC**  
2201 Waukegan Road, Suite 130  
Bannockburn, IL 60015  
Telephone: (224) 632-4500  
mfreed@fklmlaw.com  
skanner@fklmlaw.com  
blondon@fklmlaw.com  
msilverman@fklmlaw.com

Eugene A. Spector  
William G. Caldes  
Jonathan M. Jagher  
Jeffrey L. Spector  
**SPECTOR ROSEMAN KODROFF  
& WILLIS, P.C.**  
1818 Market Street, Suite 2500  
Philadelphia, PA 19103  
Telephone: (215) 496-0300  
espector@srkw-law.com  
bcaldes@srkw-law.com  
jjagher@srkw-law.com  
jspector@srkw-law.com

Interim Co-Lead Counsel for the Direct Purchaser  
Plaintiffs

Don Barrett  
David McMullan  
Brian Herrington  
**BARRETT LAW GROUP, P.A.**  
P.O. Box 927  
404 Court Square  
Lexington, MS 39095  
(662) 834-2488  
dbarrett@barrettlawgroup.com  
bherrington@barrettlawgroup.com  
dmcmullan@barrettlawgroup.com

/s/ Jonathan W. Cuneo (w/ consent)  
Jonathan W. Cuneo  
Joel Davidow  
Victoria Romanenko  
**CUNEO GILBERT & LADUCA, LLP**  
507 C Street, N.E.  
Washington, DC 20002  
(202) 789-3960  
jonc@cuneolaw.com  
joel@cuneolaw.com  
vicky@cuneolaw.com

Shawn M. Raiter  
Paul A. Sand  
**LARSON KING, LLP**  
2800 Wells Fargo Place  
30 East Seventh Street  
St. Paul, MN 55101  
(651) 312-6500  
sraiter@larsonking.com  
psand@larsonking.com

Interim Co-Lead Counsel for the Automobile  
Dealer Plaintiffs

/s/ Marc M. Seltzer (w/ consent)

Marc M. Seltzer

Steven G. Sklaver

**SUSMAN GODFREY L.L.P.**

1901 Avenue of the Stars, Suite 950

Los Angeles, CA 90067-6029

Telephone: (310) 789-3100

Facsimile: (310) 789-3150

mseltzer@susmangodfrey.com

ssklaver@susmangodfrey.com

Terrell W. Oxford

Warren T. Burns

**SUSMAN GODFREY L.L.P.**

901 Main Street, Suite 5100

Dallas, Texas 75202

Telephone: (214) 754-1900

Facsimile: (214) 754-1933

toxford@susmangodfrey.com

wburns@susmangodfrey.com

Joseph W. Cotchett

Steven N. Williams

Adam J. Zapala

Gene W. Kim

**COTCHETT, PITRE & McCARTHY, LLP**

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Facsimile: (650) 697-0577

jcotchett@cpmlegal.com

swilliams@cpmlegal.com

azapala@cpmlegal.com

gkim@cpmlegal.com

Hollis Salzman  
Bernard Persky  
William V. Reiss  
**ROBINS, KAPLAN, MILLER  
& CIRESI L.L.P.**  
601 Lexington Avenue, Suite 3400  
New York, NY 10022  
Telephone: (212) 980-7400  
Facsimile: (212) 980-7499  
hsalzman@rkmc.com  
bpersky@rkmc.com  
wvreiss@rkmc.com

Interim Co-Lead Counsel for the End-Payor  
Plaintiffs

/s/Larry S. Gangnes

---

Larry S. Gangnes  
Connor B. Shively  
LANE POWELL PC  
1420 Fifth Ave., Suite 4200  
P.O. Box 91302  
Seattle, WA 98111-9402  
Telephone: (206) 223-7000  
Facsimile: (206) 223-7107  
gangnesl@lanepowell.com  
shivelyc@lanepowell.com

Craig D. Bachman  
Kenneth R. Davis II  
Darin M. Sands  
Masayuki Yamaguchi  
LANE POWELL PC  
ODS Tower  
601 SW Second Ave., Suite 2100  
Portland, OR 97204-3158  
Telephone: (503) 778-2100  
Facsimile: (503) 778-2200  
bachmanc@lanepowell.com  
davisk@lanepowell.com  
sandsd@lanepowell.com  
yamaguchim@lanepowell.com

Richard D. Bisio (P30246)  
Ronald S. Nixon (P57117)  
KEMP KLEIN LAW FIRM  
201 W. Big Beaver, Suite 600  
Troy, MI 48084  
Telephone: (248) 528-1111  
Facsimile: (248) 528-5129  
richard.bisio@kkue.com  
ron.nixon@kkue.com

Attorneys for Defendants Furukawa Electric Co.,  
Ltd.; American Furukawa, Inc.; and  
Furukawa Wiring Systems America, Inc.



/s/ John M. Majoras (w/ consent)

John M. Majoras  
Carmen G. McLean  
Kristen Lejnieks  
Tiffany Lipscomb-Jackson  
JONES DAY  
51 Louisiana Ave. N.W.  
Washington, D.C. 20001-2113  
(202) 879-3939  
(202) 626-1700 (facsimile)  
jmmajoras@jonesday.com  
cgmclean@jonesday.com

Michelle K. Fischer  
Stephen J. Squeri  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, OH 44114  
(216) 586-3939  
(216) 579-0212 (facsimile)  
mfischer@jonesday.com  
sjsqueri@jonesday.com

Attorneys for Defendants Yazaki Corporation,  
and Yazaki North America, Inc.

/s/ Marguerite M. Sullivan (w/ consent)

Marguerite M. Sullivan  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, DC 20004  
Telephone: (202) 637-2200  
Fax: (202) 637-2201  
Marguerite.Sullivan@lw.com

Daniel M. Wall  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: (415) 395-0600  
Fax: (415) 395-8095  
dan.wall@lw.com

William H. Horton (P31567)  
GIARMARCO, MULLINS & HORTON, P.C.  
101 West Big Beaver Road, Tenth Floor  
Troy, MI 48084-5280  
Telephone: 248-457-7060  
bhorton@gmhlaw.com

Attorneys for Defendants Sumitomo Electric Industries, Ltd.; Sumitomo Electric Wintec America, Inc.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc.; K&S Wiring Systems, Inc.; and Sumitomo Wiring Systems (U.S.A.) Inc.

/s/Steven F. Cherry (w/consent)

Steven F. Cherry  
David P. Donovan  
Stephanie K. Wood  
Elizabeth Martin  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
1875 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
Telephone: (202) 663-6000  
Fax: (202) 663-6363  
steven.cherry@wilmerhale.com  
david.donovan@wilmerhale.com  
stephanie.wood@wilmerhale.com  
ellie.martin@wilmerhale.com

Attorneys for Defendants DENSO International  
America, Inc., and DENSO Corporation  
Steven M. Zarowny (P33362)  
General Counsel  
DENSO International America, Inc.  
24777 Denso Drive  
Southfield, MI 48033  
Telephone: (248) 372-8252  
Fax: (248) 213-2551  
steve\_zarowny@denso-diam.com

Attorney for Defendant DENSO International  
America, Inc.

/s/James L. Cooper (w/consent)

James L. Cooper  
Michael A. Rubin  
Laura Cofer Taylor  
Katherine Clemons  
ARNOLD & PORTER LLP  
555 Twelfth Street NW  
Washington, DC 20004  
Telephone: (202) 942-5014  
Fax: (202) 942-5999  
james.cooper@aporter.com  
michael.rubin@aporter.com  
laura.taylor@aporter.com  
katherine.clemons@aporter.com

Joanne Geha Swanson (P33594)  
Fred Herrmann (P49519)  
Matthew L. Powell (P69186)  
500 Woodward Avenue, Suite 2500  
KERR, RUSSELL AND WEBER, PLC  
Detroit, MI 48226  
Telephone: (313) 961-0200  
Fax: (313) 961-0388  
jswanson@kerr-russell.com  
fherrmann@kerr-russel.com  
mpowell@kerr-russell.com

Attorneys for Defendants Fujikura Ltd., and  
Fujikura Automotive America LLC

/s/Wm. Parker Sanders (w/consent)  
Wm. Parker Sanders (Georgia Bar No. 626020)  
SMITH, GAMBRELL & RUSSELL, LLP  
Promenade II, Suite 3100  
1230 Peachtree Street, N.E.  
Atlanta, Georgia 30309  
Telephone: (404) 815-3684  
psanders@sgrlaw.com

Jeffrey G. Heuer (P14925)  
Peter M. Falkenstein (P61375)  
JAFFE, RAITT, HEUER & WEISS, P.C.  
27777 Franklin Rd., Ste. 2500  
Southfield, MI 48034  
Telephone: (248) 351-3000  
jheuer@jaffelaw.com  
pfalkenstein@jaffelaw.com

Attorneys for Defendant Kyungshin-Lear Sales  
and Engineering, LLC

/s/Howard B. Iwrey (w/consent)

Howard B. Iwrey (P39635)  
DYKEMA GOSSETT PLLC  
39577 Woodward Avenue, Suite 300  
Bloomfield Hills, MI 48304  
(248) 203-0526 – Telephone  
hiwrey@dykema.com

Andrew S. Marovitz  
Britt M. Miller  
MAYER BROWN LLP  
71 S. Wacker Drive  
Chicago, IL 60606  
Telephone: (312) 782-0600  
Fax: (312) 701-7711  
amarovitz@mayerbrown.com  
bmiller@mayerbrown.com

Attorneys for Defendant Lear Corporation

/s/Michael F. Tubach (w/consent)

Michael F. Tubach  
O'MELVENY & MYERS LLP  
Two Embarcadero Center, 28th Floor  
San Francisco, CA 94111  
Telephone: (415) 984-8700  
Fax: (415) 984-8701  
Mtubach@omm.com

Michael R. Turco (P48705)  
BROOKS WILKINS SHARKEY & TURCO  
PLLC  
401 South Old Woodward, Suite 400  
Birmingham, MI 48009  
Telephone: (248) 971-1713  
Fax: (248) 971-1801  
turco@bwst-law.com

Attorneys for Defendants Leoni Wiring Systems,  
Inc., and Leonische Holding Inc.

/s/David F. DuMouchel (w/consent)  
David F. DuMouchel (P25658)  
George B. Donnini (P66793)  
BUTZEL LONG  
150 West Jefferson, Suite 100  
Detroit, MI 48226  
Telephone: (313)225-7000  
dumouchd@butzel.com  
donnini@butzel.com

W. Todd Miller  
BAKER & MILLER PLLC  
2401 Pennsylvania Ave., NW, Suite 300  
Washington, DC 20037  
Telephone: (202)663-7820  
TMiller@bakerandmiller.com

Attorneys for Defendants Tokai Rika Co., Ltd.,  
and TRAM, Inc.

/s/ Donald M. Barnes (w/consent)

Donald M. Barnes

Salvatore A. Romano

John C. Monica

Molly S. Crabtree

Karri N. Allen

PORTER WRIGHT MORRIS & ARTHUR LLP

1919 Pennsylvania Ave., NW, Ste 500

Washington, DC 20006

Telephone: (202) 778-3054

Facsimile: (202) 778-3063

dbarnes@porterwright.com

sromano@porterwright.com

jmonica@porterwright.com

mcrabtree@porterwright.com

kallen@porterwright.com

Attorneys for Defendants G.S. Electech, Inc.;  
G.S.W. Manufacturing, Inc.; and G.S. Wiring  
Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2013, I caused to be electronically filed a copy of the foregoing Stipulation of Voluntary Dismissal with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

*/s/Larry S. Gangnes*

Larry S. Gangnes (WA State Bar No. 8118)

**LANE POWELL PC**

1420 Fifth Avenue, Suite 4200

P.O. Box 91302

Seattle, WA 98111-9402

Telephone: 206.223-7000

Facsimile: 206.223-7107

gangnesl@lanepowell.com

Attorneys for Defendants Furukawa Electric Co., Ltd.; American Furukawa, Inc.; and Furukawa Wiring Systems America, Inc.